

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) Stephanie F. Ritigstein, Esquire <b>Jenkins &amp; Clayman</b> 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re:  Maureen Falls, debtor	Case No.: 17-17906  Judge: JNP  Chapter: 13

- CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**  
☒ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**  
☐ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by

Bunker Hill Development, creditor.

A hearing has been scheduled for August 22, 2017 at 10:00 a.m.

OR

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee, \_\_\_\_\_.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_, creditor

I am requesting a hearing be scheduled in this matter.

OR

- ☐ Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support of attached hereto.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows **explain your answer**): To the contrary. I have made all my post-petition payments. My May 2017 payment was made via check #903 in the amount of \$204.00. I paid my June 2017 payment via check #878 in the amount of \$204.00. To date, these checks have not been cashed, nor returned to me. They were both sent to MAMCO via their provided coupon and envelope. My July 2017 payment of \$204.00 was made timely. However, MAMCO did not deposit this payment until after this motion was filed on August 1, 2017. Further, I mailed my August 2017 payment timely. Again, this payment has not been cashed. I would request that MAMCO start cashing my checks upon receipt to avoid these motion in the future. If necessary, I will replace the missing payments immediately.

☐ Other (**explain your answer**): \_\_\_\_\_

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 8.14.17

/s/ Maureen Falls  
Maureen Falls , debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.

2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

**If this form is not filed the Motion or Certification of Default will be deemed uncontested**